

ATTACHMENT 1

COMPLAINT FORM

(for filers who are prisoners without lawyers)



IN THE UNITED STATES DISTRICT COURT
FOR THE Eastern DISTRICT OF Wisconsin

(Full name of plaintiff(s))

Andre Nathaniel Jackson

vs

Case Number:

(Full name of defendant(s))

(to be supplied by clerk of court)

JA. Coral Kopp

L.T. Mary Ruechel

Nurse; Neumeier

Nurse; Jody Cpl Longsine

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and is located at
(State)

Oconto County Jail 301, Washington St, Oconto, WI 54153
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant J.A. Coral Kopp L.T. Mary Ruechel Nurse, Neumeier
Cpl Lonsine Nurse, Jody (Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Oconto County Jail 301 Washington St, Oconto, WI
(Employer's name and address, if known) 54153

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Now on November 6 2021 I was booked into Oconto,
County, Jail, on around 12-03-21 was the first time
I complained in wrote a Medical Inquiry on the
kiosk, but about three weeks before that I
started experiencing excruciating pain to my
left side by the kidney area. I be in so much
pain that I can't sleep at night. When it first
started all I could do was ball up in cry. Now
on 12/03/21 I notice my urine was very dark

and unusual, after that I whipped myself with tissue. I notice that I was peeing blood. On 12/26/21 I continued to complain about my kidney and the pain I was in, I wrote another medical inquiry, and I was told to give a urine sample again by Nurse, Neumeier, but I refused to give one the first time because I was in so much pain that I couldn't get out the bed. Nurse, Neumeier came to see me and told me that it was blood specs found in my urine. I was also given tylenol for the pain, which I told the nurse the tylenol was not working. On 02/02/22 I put in another medical inquiry in said my kidney pain is getting worst I also said im over the covid-19 im not sick anymore and that was because two weeks before I put in this medical inquiry I was fighting the covid and was quarantine. She replied by saying your s.t.d test is negative and your second urine test showed improvement, thats why the tylenol was extended for pain. In she said

that right after I just told her that the pain is getting worst. On 02/10/22 I wrote another medical Inquiry and said that I was bleeding when I deficate. She told me that next time I deficate dont flush the toilet, have one of the correctional officers take a look, which I did and Officer Scott Brattain was the one who witness it. And at that time I was in so much pain, my kidney area was hurting in there wasnt no solution to what was wrong with me. On 02/16/22 I put another medical Inquiry in and said my kidney is still hurting im still having kidney pain my pain is at a six right now. Nurse Neumeier said the provider ordered for a urinalysis and culture, when this is approved I will ask for another urine sample. On 02/17/22 I wrote another medical Inquiry in my words were. (so am I just suppose to suffer for the time being, I been going through this issue for two months and a half and it started happening here and I only been hear for three and a half months I dont know what it's I just know im bleeding on the inside and my insides

Attachment One (Complaint)- 3-A

are on firer and its getting worst and worst and this been the problem but its not resolved my pain be at a 18+ when its time for bed I cant even get no sleep. Now on 03/01/22 I went to trial for the charges I was facing, I beat counts 1, and 2, I was found guilty on count 3, I was released from Oconto, County, Jail, on 03/02/22 on bond, A week later I had sentancing for count 3, but I missed court and a warrent was put out for my arrest. Anyways I missed court do to a death in my family back in Chicago. After my cousin funeral, I went to the hospital right away to see why I was having these problems but I never got my results because I got arrested for the Warrent on 05/21/22 and was booked back into Oconto, County, Jail, now on 07/21/22 I was sentance on count 3, I ended up getting shipped to prison on 07/27/22 the whole time I was in prison I complained about being in pain to the doctors. I was giving stool softners to deficate and pills to help me urinate in case of Kidney Stones to make a long story short I was bleeding

Attachment two(Complaint)-3-B

out in prison they tryed to help me as much as they could, but they didnt know what was wrong with me. On 03/21/23 I was extradited back to Oconto, County, Jail, facing new charges. Now on 06/12/23 I started experiencing the same excruciating pain to my kidney as before. On 06/12/23 I put in a medical Inquiry about my kidney and the pain im in and I was told by nurse, Jody to give a urine sample, which I did and I was also given tylonal for the pain, which the tylonal was not helping with the pain. So I put in another medical Inquiry on 06/14/23 and 06/27/23 also 07/09/23 now in between one of those's days Nurse, Jody came to see me. And thats when I found out that Nurse, Neumeier didn't work here anymore. But when Nurse, Jody came to see me she told me that my test results came back negative. I replied by telling Nurse, Jody that im still in pain and also the last time my test results came back negative to but they were sent out to a specialist the second time and thats when they found blood in my urine. Nurse, Jody said that she would

Attachment three(Complaint)-3-C

put it in her notes that I told her that. After that I was seen by the provider on her next available appointment and I told her the same thing and they ran blood test. Now on 07/17/23 and 07/18/23 I put in medical Inquiries about the pain that im constantly, having and how I cant sleep at night. I also mention that the tyonal and ibuprofen was not working and I need to go to the hospital cause something is wrong with me. I even wrote a grievance thats attached and still to this day nothing has been done. In these are the responses to my grievance (Lt. Ruechel said we will follow up with the nurse to see if provider has reviewed the test you state was being looked at and what treatment plan is being done) (Lt. Ruechel, Nurse states the lab work came back normal but she will be having the provider look at, well at the results) (J.A. I will put you on the doctor list ok). To this day I haven't seen no doctor or heard nothing else about it. Im still suffering in pain every day with possible chances of bleeding

Attachment Four (Complaint) 3-D

internally. I have also asked for a copy of my medical Inquiries for which I received on August 10th they are also attached to ~~this~~ complaint as Exhibits. And also I would like to mention another incident that's in connection with this incident. On 07/18/23 I submitted a medical form that's also attached. And Cpl Longsine responded violating my HIPPA rights by saying (Tonight while completing the 2200 watch tour I watched Mr Jackson doing push ups and working out in the pod 1 day room. He did not appear pained at all). Now that is not her place she had no business responding to my medical form about a medical issue, because she's not a registered nurse. Also I was not able to see her response on my side of the kiosk. Because if so I would have responded, which is probably the reason I didn't receive medical attention. Why would she hide her response so I wouldn't see it on my side but the nurse and the rest of the correctional officers can see it. The only reason I was able to see it, is because I got copies of my medical form so I could attach it to this complaint.

Attachment Five (Complaint) 3-E

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

The Plaintiff is asking to be awarded compensatory damages in the amount of \$500,000.00 five hundred thousand dollars from defendants for violations of the Eighth Amendment to my constitutional rights

The Plaintiff is asking to be awarded punitive and injunctive relief damages in the amount of \$500,000.00 five hundred thousand dollars

from defendants. I'm suing them in both official and individual capacities.

Plaintiff also seeks relief to be checked and scanned at the hospital to get some results and help for pain.

E. JURY DEMAND

- ☒ Jury Demand - I want a jury to hear my case
OR
☐ Court Trial – I want a judge to hear my case

Dated this 23 day of August 2023.

Respectfully Submitted,

Debra Jackson
Signature of Plaintiff

133666
Plaintiff's Prisoner ID Number

Oconto County Jail 301 Washington
Street Oconto, WI 54153
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

- ☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.
- ☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.